

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta Payments, Inc.

**DECLARATION OF MEGAN O'NEILL  
IN SUPPORT OF STATE ATTORNEYS  
GENERAL'S ADMINISTRATIVE  
MOTION TO ENFORCE PAGE LIMITS  
SET FORTH IN JUDGE KANG'S  
STANDING ORDER FOR DISCOVERY  
IN CIVIL CASES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook Holdings, LLC, Facebook Operations, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION THIS  
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

1 I, MEGAN O'NEILL, hereby declare and state as follows:

2 1. I am a Deputy Attorney General in the Consumer Protection Section of the  
3 California Department of Justice. I am a member in good standing of the State Bar of California. I  
4 am one of the attorneys representing the People of the State of California ("People") in this law-  
5 enforcement action. The following facts are within my personal knowledge, except for those  
6 stated on information and belief, and, if called upon to testify, I could and would testify  
7 completely to the truth of the matters stated herein.

8 2. On December 3, 2024, counsel for the People met and conferred with Meta's  
9 counsel twice regarding, among other issues, page limits applicable to upcoming discovery letter  
10 briefing regarding disputes concerning the production of state agency documents.

11 3. In the latter meet-and-confer, Meta's counsel sought to impose a 1/2 page letter  
12 briefing limit on each of the sovereign, separate plaintiffs in this law-enforcement action, with a  
13 single "combined" brief of 5 pages for all State AGs.

14 4. Counsel for the People alerted Meta's counsel to the unreasonableness and  
15 unworkability of their position, given the number of State AGs and agencies at issue.

16 5. The parties reached an impasse on this point, necessitating the submission of the  
17 administrative motion to ensure that the State Attorneys General are not unfairly prejudiced by  
18 truncated presentation of their position on these critical issues.

19 6. Meta has propounded dozens of RFPs seeking documents from more than 270  
20 state agencies in the home states of 35 State Attorneys General and has served notice of its intent  
21 to serve more than 140 subpoenas to state agencies.

22 7. On information and belief, many agency counsel have engaged in meet and  
23 confers with Meta's counsel regarding custodians, search terms, and hit reports, and Meta has  
24 settled on search terms with the agencies in only one state.

25 8. Meta has insisted on "polic\*," "social media," "practice," and "concern" as search  
26 terms for state agencies.

27 9. Despite the State AGs' repeated requests, Meta's counsel has not identified (1) the  
28 State AGs against whom it intends to raise any particular disputes regarding state agency

1 document production and (2) the relief that Meta seeks with respect to any State AG or agency.

2 10. On both December 3 and December 4, 2024, Meta's counsel stated that Meta  
3 would not agree to the relief sought in the administrative motion.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

6 Executed on December 4, 2024, in San Francisco, California.

7  
8 */s/ Megan O'Neill*

9 \_\_\_\_\_  
Megan O'Neill